



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

TIDEWATER REGIONAL OFFICE

Doug Domenech
Secretary of Natural Resources

5636 Southern Boulevard, Virginia Beach, Virginia 23462
(757) 518-2000 Fax (757) 518-2009
www.deq.virginia.gov

David K. Paylor
Director

Maria R. Nold
Regional Director

STATEMENT OF LEGAL AND FACTUAL BASIS

Norfolk Naval Shipyard
Portsmouth, Virginia
Permit No.: TRO-60326

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Norfolk Naval Shipyard has applied for a Title V Operating Permit for its Portsmouth facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Permit Writer:

Laura D. Corl
(757) 518-2178

Date: _____

Regional Air Permits Manager:

Troy D. Breathwaite

Date: _____

Regional Director:

Maria R. Nold

Date: _____

I. FACILITY INFORMATION - NORFOLK NAVAL SHIPYARD

Permittee:

Norfolk Naval Shipyard
Portsmouth, VA 23709-5000

Responsible Official:

Mr. Cameron Harper
Director of Occupational, Safety, Health and Environmental Division
by Direction of the Shipyard Commander

Facility

Norfolk Naval Shipyard
Portsmouth, VA 23709-5000

Contact Person:

Rhonda A. Ford
Air Program Manager
(757) 396-4619
rhonda.a.ford@navy.mil

County-Plant Identification Number: 51-740-00006

Facility Description: NAICS 928110 and 336611 – NNSY is one of four NAVY shipyards in the United States. The facility occupies 810 acres and employs approximately 7,000 people. NNSY has the capability to dry-dock any NAVY vessel including nuclear and non-nuclear powered carriers and submarines. There are five operable dry-docks located at NNSY and multiple slips and piers. A variety of activities is conducted in support of repair and overhaul operations including, but not limited to: blasting, painting, welding, electroplating, utility steam production, machining and crane loading. Many of these activities are conducted in large buildings and shops located in the industrial area of the yard. Shipboard equipment and machinery is often removed from a dry-docked vessel by overhead crane, and is taken to various shops within the shipyard for repair or overhaul after which they are returned to the ship for re-installation. Steam to run parts of the facility is supplied by Wheelabrator Portsmouth Inc. The shipyard also has eight peaking generators onsite to supply power to the grid when necessary.

The following North American Industry Classification System (NAICS) codes apply to the operations at NNSY:

- 928110 (9711) - National security
- 336611 (3731) - Shipbuilding and repairing

The Southgate Annex, which is located next to NNSY, is owned and operated by the Commander, Navy Region Mid-Atlantic (CNRMA). Emission units for this area are listed in the CNRMA section of the permit. New Gosport, Stanley Court and Scott Center are not considered part of this facility for Title V purposes.

The facility is a Title V major source for all criteria pollutants. It is also a major source of HAPs and is therefore, subject to the Shipbuilding MACT (Subpart II), the Chrome MACT (Subpart N), the RICE MACT (Subpart ZZZZ), the CI ICE NSPS (Subpart IIII) and the Asbestos NESHAP (Subpart M). This source is located in an attainment area for ozone and in an attainment area for all other pollutants, and is a PSD major source because of its relationship with Wheelabrator Portsmouth Inc. Wheelabrator Portsmouth Inc. is a support facility for NNSY by supplying steam to the shipyard. The facility is currently permitted under a Minor NSR Permit issued on August XX, 2012.

This permit action is to renew the facility's Title V Operating Permit and incorporate the changes in the minor NSR permit into the Title V permit.

II. FACILITY INFORMATION – COMMANDER NAVY REGION MID-ATLANTIC (CNRMA)

Permittee

Commander Navy Region Mid-Atlantic
Code N547
1510 Gilbert Street
Norfolk, VA 23511

Responsible Official

Cheryl F. Barnett
Head Regional Environmental Group
By direction of the Commander

Facility

Southgate Annex
Norfolk Naval Shipyard
Portsmouth, VA 23709-5000

Contact Person

Leal Boyd
Air Program Manager
(757) 341-0387

AFS Identification Number: 51-740-00006

Facility Description: CNRMA owns and operates the Southgate Annex, which is located next to the Norfolk Naval Shipyard. The Southgate Annex is a storage facility for inactive naval vessels (NNSY owns 4 of the 6 piers). The area includes 63 acres and approximately 80 employees are associated with the Southgate Annex. Maintenance of these inactive vessels is done to ensure their integrity while in storage or to prepare them for re-use or disposal. The Naval Facilities Mid-Atlantic (NAVFAC MIDLANT) uses space to park vehicles (when not leased) which are leased to various government activities. The Intra-Fleet Supply Support Operations Team (ISSOT) also has a presence. The ISSOT provides temporary labor to the Department of Defense and other federal agencies and they also have some buildings used for storage. Maritime Expeditionary Security Group TWO (MESG-2) performs maintenance on small boats, vehicles, and portable generators and operates two small arms firing ranges at the facility. No boat painting occurs.

- 928110 (9711) - National security

III. COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted (8/15/11). In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has *not* been found to be in violation of any state or federal applicable requirements at this time.

IV. EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of a large number of internal combustion engines, some painting and blasting booths, outdoor blasting and painting of parts and vessels, wood working operations, degreasing operations, electroplating operations, and some vehicle fuel filling stations. The table below itemizing a complete list of all units and pollution control devices associated with this facility. The emission unit ID numbers have been updated to include the location of the unit for ease of locating units.

A. Shipyard Significant Emission Units:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Internal Combustion Engines - Generators							
ICGF-B1582-002	-	Emergency Generator Engine, Caterpillar 3412 (1997) 40 CFR 63 Subpart ZZZZ	5,690 mmBtu/hr, 671 HP, 500 KW	-	-	-	-
ICGF-BERTH19-009	-	Emergency Generator Engine, Detroit Diesel 12171 (1967) 40 CFR 63 Subpart ZZZZ	4,738 mmBtu/hr, 300 HP, 224 KW	-	-	-	-
ICGF-B1500-023	-	Emergency Generator Engine, Caterpillar, SR2, (1983), 40 CFR 63 Subpart ZZZZ	4,34 mmBtu/hr, 805 HP, 370 KW	-	-	-	-
ICGF-PORTNSY-236-025	-	Emergency Generator Engine, Cummins 4A2-3-G1 (1991), 40 CFR 63 Subpart ZZZZ	0.91 mmBtu/hr, 60 HP, 45KW	-	-	-	-
ICGF-PORTNSY-1485-026	-	Emergency Generator Engine, Caterpillar 3408DI (1977) 40 CFR 63 Subpart ZZZZ	3.35 mmBtu/hr, 73 HP, 54 KW	-	-	-	-
ICGF-B277-027	-	Emergency Generator Engine, Cummins 6A3.4-G1 (1991), 40 CFR 63 Subpart ZZZZ	0.46 mmBtu/hr, 34 HP, 25 KW	-	-	-	-
ICGF- B1580-036	-	Emergency Generator Engine, Caterpillar, 3516 (1994), 40 CFR 63 Subpart ZZZZ	16,856 mmBtu/hr, 2174 HP, 1600 KW	-	-	-	6/28/10
ICGF- B1580-037	-	Emergency Generator Engine, Caterpillar, 3516 (1994), 40 CFR 63 Subpart ZZZZ	16,856 mmBtu/hr, 2174 HP, 1600 KW	-	-	-	6/28/10

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
ICGF- B1580-038	-	Emergency Generator Engine, Caterpillar, 3516 (1994), 40 CFR 63 Subpart ZZZZ	16.856 mmBtu/hr, 2174 HP, 1600 KW	-	-	-	6/28/10
ICGF-B1580-039	-	Emergency Generator Engine, Caterpillar, 3516 (1994), 40 CFR 63 Subpart ZZZZ	16.856 mmBtu/hr, 2174 HP, 1600 KW	-	-	-	6/28/10
ICGF-B1580-040	-	Emergency Generator Engine, Caterpillar, 3516 (1994), 40 CFR 63 Subpart ZZZZ	16.856 mmBtu/hr, 2174 HP, 1600 KW	-	-	-	6/28/10
ICGF-B1580-041	-	Emergency Generator Engine, Caterpillar, 3516 (1994), 40 CFR 63 Subpart ZZZZ	16.856 mmBtu/hr, 2174 HP, 1600 KW	-	-	-	6/28/10
ICGF-B1580-042	-	Emergency Generator Engine, Caterpillar, 3516 (1994), 40 CFR 63 Subpart ZZZZ	16.856 mmBtu/hr, 2174 HP, 1600 KW	-	-	-	6/28/10
ICGF-B1580-043	-	Emergency Generator Engine, Caterpillar, 3516 (1994), 40 CFR 63 Subpart ZZZZ	16.856 mmBtu/hr, 2174 HP, 1600 KW	-	-	-	6/28/10
ICGF-DD#3-046	-	Emergency Generator Engine, Caterpillar, 3306B (1988) 40 CFR 63 Subpart ZZZZ	2.78 mmBtu/hr 306 HP, 228 KW	-	-	-	-
ICGF-DD#2-047	-	Emergency Generator Engine, Caterpillar, 3412 (1994) 40 CFR 63 Subpart ZZZZ	4.738 mmBtu/hr, 749 HP, 500 KW	-	-	-	-
ICGF-DD#4-049	-	Emergency Generator Engine- Caterpillar, 3412 (1994), 40 CFR 63 Subpart ZZZZ	5.690 mmBtu/hr 890 HP, 600 KW	-	-	-	-
ICGF-B236-050	-	Emergency Generator Engine, Gillette , GPD-75E, (pre-2000), 40 CFR 63 Subpart ZZZZ	0.10 mmBtu/hr, 10 HP, 8 KW	-	-	-	-
ICGF-B295-055	-	Fire Pump Engine, Detroit Diesel, PTA 15D273, (pre-2000), 40 CFR 63 Subpart ZZZZ	0.10 mmBtu/hr, 100 HP, 73 KW	-	-	-	-
ICGF-B1539-083	-	Emergency Generator Engine, Caterpillar (pre-2000), Bldg 261, 40 CFR 63 Subpart ZZZZ	3.78 mmBtu/hr, 416 HP, 310 KW	-	-	-	-
ICGF-B1475-085	-	Emergency Generator Engine, Allis-Chalmers, (pre-2000), 40 CFR 63 Subpart ZZZZ	1.22 mmBtu/hr, 135 HP, 100 KW	-	-	-	-
ICGF-B19-088	-	Emergency Generator Engine, Olympian (1994) 40 CFR 63 Subpart ZZZZ	1.52 mmBtu/hr, 169 HP, 125 KW	-	-	-	-
ICGF-B369-091	-	Emergency Generator Engine, Cummins (pre-2000) 40 CFR 63 Subpart ZZZZ	0.41 mmBtu/hr, 40 HP, 30 KW	-	-	-	-
ICGF-DD#8-093	-	Emergency Generator Engine ,Caterpillar, 3412 (1994), 40 CFR 63 Subpart ZZZZ	5.640 mmBtu/hr, 890 HP, 600 KW	-	-	-	-
ICGF-B369-095	-	Fire Pump Engine, Detroit Diesel (pre-2000), 40 CFR 63 Subpart ZZZZ	0.91 mmBtu/hr, 100 HP, 73 KW	-	-	-	-
ICGF-SWP829(2)-099	-	Emergency Generator Engine, Caterpillar 3406 (12/04) 40 CFR 63 Subpart ZZZZ	2.04 mmBtu/hr, 440 HP, 328 KW	-	-	-	-
ICGF-PORTNSY-269-123	-	Emergency Generator Engine, Olympian YD50761 (2004) 40 CFR 63 Subpart ZZZZ	1.38 mmBtu/hr, 168 HP, 125 KW	-	-	-	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
ICGF-B39-124	-	Emergency Generator Engine, Perkins 2334/1080 (2004), 40 CFR 63 Subpart ZZZZ	1.64 mmBtu/hr, 203 HP, 150 KW	-	-	-	-
ICGF-DD#2-125	-	Emergency Generator Engine, Perkins 2334/1080 (2004), 40 CFR 63 Subpart ZZZZ	1.64 mmBtu/hr, 203 HP, 150 KW	-	-	-	-
ICGF-B171-126	-	Emergency Generator Engine, Perkins 2334/1080 (2004), 40 CFR 63 Subpart ZZZZ	1.64 mmBtu/hr, 203 HP, 150 KW	-	-	-	-
ICGF-B235-127	-	Emergency Generator Engine, Perkins 2334/1080 (2004) 40 CFR 63 Subpart ZZZZ	1.64 mmBtu/hr, 203 HP, 150 KW	-	-	-	-
ICGF-B272 128	-	Emergency Generator Engine, Perkins 2334/1080 (2004) 40 CFR 63 Subpart ZZZZ	1.64 mmBtu/hr, 203 HP, 150 KW	-	-	-	-
ICGF-B508-130	-	Emergency Generator Engine, Caterpillar C9 (1/09) - 40 CFR 60 Subpart IIII, 40 CFR 63 Subpart ZZZZ	2.74 mmBtu/hr, 335 HP, 250 KW	-	-	-	-
ICGF-B1618-131	-	Emergency Generator Engine, Caterpillar LC6 (2005), 40 CFR 63 Subpart ZZZZ	5.12 mmBtu/hr, 764 HP, 570 KW	-	-	-	-
ICGF-B1500-132	-	Emergency Generator Engine, Caterpillar C4.4 (9/2008), 40 CFR 60 Subpart IIII, 40 CFR 63 Subpart ZZZZ	2.63 mmBtu/hr, 156 HP, 116 KW	-	-	-	-
ICGF-B261-133	-	Emergency Generator Engine, Caterpillar LC6 (2006) 40 CFR 60 Subpart IIII, 40 CFR 63 Subpart ZZZZ	5.12 mmBtu/hr, 764 HP, 570 KW	-	-	-	-
ICGF-PORTNSY-385-135	-	Emergency Generator Engine, Caterpillar 3306 (4/1/2006) 40 CFR 63 Subpart ZZZZ	2.42 mmBtu/hr, 312 HP, 250 KW	-	-	-	-
ICGF-PORTNSY-507-136	-	Emergency Generator Engine, Caterpillar D30P1 (1998) 40 CFR 63 Subpart ZZZZ)	0.32 mmBtu/hr, 40 HP, 30 KW	-	-	-	-
ICGF-SWP60-137	-	Emergency Generator Engine, Detroit Diesel 71247602 (1967), 40 CFR 63 Subpart ZZZZ	3.91 mmBtu/hr, 500 HP, 372 KW	-	-	-	-
ICGF-SWP828-138	-	Emergency Generator Engine, Caterpillar 3406 (12/04) 40 CFR 63 Subpart ZZZZ	3.91 mmBtu/hr, 440 HP, 328 KW	-	-	-	-
ICGF-SWP829(1)-139	-	Emergency Generator Engine, Caterpillar 3406 (12/04) 40 CFR 63 Subpart ZZZZ	3.91 mmBtu/hr, 440 HP, 328 KW	-	-	-	-
ICGF-SWP831-140	-	Emergency Generator Engine, Caterpillar IBF314P1 (11/88) 40 CFR 63 Subpart ZZZZ	2.92 mmBtu/hr, 322 HP, 240 KW	-	-	-	-
ICGF-SWP832-141	-	Emergency Generator Engine, Caterpillar 3406 (12/04) 40 CFR 63 Subpart ZZZZ	3.91 mmBtu/hr, 440 HP, 328 KW	-	-	-	-
ICGF-PORTNSY-174-143	-	Emergency Generator Engine, Caterpillar, D30P3 (2004) 40 CFR 63 Subpart ZZZZ	0.47 mmBtu/hr, 40 HP, 30 KW	-	-	-	-
ICGF-B65-144	-	Emergency Generator Engine, Caterpillar D60P1, (1998)	0.73 mmBtu/hr, 80 HP, 60 KW	-	-	-	-
ICGF-B1502-145	-	Emergency Generator Engine, John Deere R504849.D04045 (6/2011), 40 CFR 63 MACT ZZZZ, 40 CFR 60 NSPS IIII	99 HP, 80 KW	-	-	-	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
ICGF-B234-146		Emergency Generator Engine, Caterpillar C15 (2012), 40 CFR 63 MACT ZZZZ, 40 CFR 60 NSPS IIII	762 HP, 500 KW	-	-	-	-
Abrasive Blast Operations							
ABRA-DOCKS-007	ASDOCKS	Outdoor/Shipboard Abrasive Blasting (various), Mark2P Compressed Air Blasting Guns	6,600 lbs/hr	Tarpaulin Enclosure	CDABRA-007	PM/PM ₁₀	-
ABRA-B236-125	-	Abrasive Blast Booth with 2 blasting nozzles and media recycling system, (24' x 14' x 12')	1,800 lb/hr per nozzle or 3600 lb/hr total	Recycling media system, Fabric filter	CDABRA-125	PM/PM ₁₀	6/28/10
Wood Working Operations							
WOOD-B276-003	STWOOD-003	Crating Woodshop (Unknown), Equipment includes Cutting saws	N/A	Cyclone	CDWOOD-003	PM/PM ₁₀	-
WOOD-B369-004	STWOOD-004	Saw Mill Woodworking Shop (Unknown) Equipment includes Sanders, Cutting Saws, Planers, etc	N/A	Fabric filter and Dust Collector	CDWOOD-004	PM/PM ₁₀	-
WOOD-B369-005	STWOOD-005	Woodworking Shop (Unknown) Equipment includes Sanders, Cutting Saws, Planers, etc	N/A	Fabric Filter and Cyclone	CDWOOD-005	PM/PM ₁₀	-
Degreasing Operations							
DEGS-B59-015	-	Tekusolv II solvent parts washer	N/A	-	-	-	-
DEGS-B268-018	-	Dry Cleaning Solvent parts washer	N/A	-	-	-	-
DEGS-B235-021	-	Parts Washer for Metal Parts, Fountain Industries (unknown)	N/A	-	-	-	-
DEGS-B235-023	-	Parts Washer for Metal Parts (unknown)	N/A	-	-	-	-
DEGS-B171-024	-	Parts Washer for Metal Parts (unknown)	N/A	-	-	-	-
DEGS-B171-025	-	Parts Washer for Metal Parts (unknown)	N/A	-	-	-	-
DEGS-B171-027	-	Parts Washer for Metal Parts (unknown)	N/A	-	-	-	-
DEGS-B171-031	-	Parts Washer for Metal Parts (unknown)	N/A	-	-	-	-
DEGS-B171-038	-	Parts Washer for Metal Parts (unknown)	N/A	-	-	-	-
DEGS-B171-044	-	Parts Washer for Metal Parts (unknown)	N/A	-	-	-	-
DEGS-B171-047	-	Parts Washer for Metal Parts, BAC Build-All-Corporation (unknown)	N/A	-	-	-	-
DEGS-B171-074	-	Parts Washer for Metal Parts, ZEP, (unknown)	N/A	-	-	-	-
DEGS-B171-078	-	Parts Washer for Metal Parts, (unknown)	N/A	-	-	-	-
DEGS-B171-094	-	Parts Washer for Metal Parts, BAC Build-All-Corporation (unknown)	N/A	-	-	-	-
DEGS-B235-095	-	PD 680 parts washer, Graymills (unknown)	N/A	-	-	-	-
DEGS-B510-098	-	PD 680 parts washer, Graymills (unknown)	N/A	-	-	-	-
DEGS-B235-099	-	Parts Washer for Metal Parts, SD-2PA Degreaser Type III (06/1971)	45 gallons	-	-	-	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
DEGS-B235-100	-	PD 680 parts washer, Safety Clean, Model 81 (3/2003)	N/A	-	-	-	-
DEGS-B235-200	-	Parts Washer for Metal Parts, (unknown)	N/A	-	-	-	-
DEGS-B171-206	-	PD 680 parts washer, Model #PW-20G (10/2001)	N/A	-	-	-	-
DEGS-B171-207	-	PD 680 parts washer, Model #PW-20G (10/2001)	N/A	-	-	-	-
DEGS-B171-208		PF 680 parts washer (large)	N/A	-	-	-	-
DEGS-B171-209		PF 680 parts washer (small) Protectaire	N/A	-	-	-	-
Electroplating Operations							
EPLT-B1512-009	-	Hard Chrome Plate Tank (2011), 40 CFR Part 63, Subpart N	N/A	Mesh-pad mist eliminator	EF-2	Cr	6/28/10
EPLT-B1512-040	-	Chromic Acid Anodize Tank (2011), 40 CFR Part 63, Subpart N	N/A	Mesh-pad mist eliminator	EF-5	Cr	6/28/10
Coating Operations							
OCOT-B510-001	-	Motor Dip Tank (Unknown), Dip Coating Application, Dip Coating Tank	N/A	-	-	-	-
OCOT-B510-002	-	Motor Dip Tank (Unknown), Dip Coating Application, Dip Coating Tank	N/A	-	-	-	-
OCOT-B510-003	-	Motor Dip Tank (Unknown), Dip Coating Application, Dip Coating Tank	N/A	-	-	-	-
PNT0- B1499-009	STPNT0-009	Portable Flame Spray Booth (5/95), Flame Spray Application, Metco, 12E	12.0 lb/hr	Water Curtain	CDPNT0-010	PM/PM ₁₀ , PM HAPs	-
PNT0- B163-011	STPNT0-011	Flame SprayRoom - Flame Spray Application, High Velocity Oxygen Fuel Spray and Plasma Spray Applications	15 lbs/hr	Fabric Filter	CDPNT0-011	PM/PM ₁₀ , PM HAPs	6/28/10
PNT0 -B163-012	-	Anchor Chain Coating Area, Metco, 12E	12.0 lbs/hr	Special application with fabric filter		PM ₁₀ , PM HAPs	
PNTS-B234-001	STPNTS-001	Devilbiss Spray Coating Booth, (mfd 1944, modified in 1996), 40 CFR Part 63, Subpart II	14 gal/hr	Fabric filter	CDPNTS-001	PM/PM ₁₀ , VOC	8/XX/12
PNTS-B234-002	-	Powder Coating Booth, 40 CFR Part 63, Subpart II	35 lbs/hr	Dry filters	CDPNTS-002	PM/PM ₁₀ , PM HAPs	-
PNTS-B510-004	STPNTS-004	Antenna Shop Paint Booth (Unknown), Conventional Air Atomized Spray Paint Application, Paint Spray Booth, 40 CFR Part 63, Subpart II	N/A	Down draft booth	CDPNTS-004	PM/PM ₁₀ , PM HAPs	-
PNTS-B510-005	STPNTS-005	Motor Paint Booth (Unknown), Conventional Air Atomized Spray Paint Application, Paint Spray Booth, 40 CFR Part 63, Subpart II	N/A	Dry filters	CDPNTS-005	PM/PM ₁₀ , PM HAPs	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
PNTSB1499-006	STPNTS-006 A STPNTS-006 B, STPNTS-006 C, STPNTS-006 D	Large Piece Spray Booth (12/31/84), Conventional Air Atomized Spray Paint Application, Large Drive-in Paint Spray Booth, 40 CFR Part 63, Subpart II	20 gal/hr	Dry filters	CDPNTS-006	PM/PM _{10s} PM HAPs	6/28/10
PNTS-B369-009	-	Plasticol Coating (Unknown), Dip Coating Application	N/A	-	-	-	-
PNTS-DOCKS-011	STPNTS-011	Spray Paint, Outdoors, (Unknown), Conventional Air Atomized Spray Paint Application, 40 CFR Part 63, Subpart II	N/A	Tarpaulin Enclosure	CDPNTS-011	PM/PM _{10s} PM HAPs	-
PNTS-B171-018	STPNTS-018	Paint Booth, (Unknown), Conventional Air Atomized Spray Paint Application, 40 CFR Part 63, Subpart II	5 gal/hr	Dry Filter	CDPNTS-018	PM _{10s} PM HAPs	-
PNTS-B1575-019	STPNTS-019	Paint Spray Booth (06/15/97), Conventional Air Atomized Spray Paint Application, 40 CFR Part 63, Subpart II	5 gal/hr	Fabric Filter	CDPNTS-019	PM/PM _{10s} PM HAPs	6/28/10
PNTS-B522-028	STPNTS-028	Binks Spray Paint Booth, Conventional Air Atomized Spray Paint Application	5 gal/hr	Fabric Filter	CDPNTS-028	PM/PM _{10s} PM HAPs	6/28/10
PNTS-B369-029	STPNTS-029	Spray Paint Booth, Conventional Air Atomized Spray Paint Application, Paint Spray Booth, 40 CFR Part 63, Subpart II	5 gal/hr	Fabric Filter	CDPNTS-029	PM/PM _{10s} PM HAPs	6/28/10
PNTS-B1499-030	STPNTS-030A STPNTS-030B	Spray Paint Booth (06/15/97), Conventional Air Atomized Spray Paint Application, Paint Spray Booth, 40 CFR Part 63, Subpart II	20 gal/hr	Fabric Filter	CDPNTS-030	PM/PM _{10s} PM HAPs	6/28/10
PNTS-B1499-031	STPNTS-031	Powder Coat Spray Booth	20 lbs/hr	Fabric Filter	CDPNTS-031	PM/PM _{10s} PM HAPs	-
PNTS-B234-033	STPNTS-033	Paint & Teflon Spray Booth-10' x 8' x 8', 40 CFR Part 63, Subpart II	19 gal/hr	Fabric Filter	CDPNTS-033	PM/PM _{10s} PM HAPs	6/28/10
PNTS-B172-034	STPNTS-034	Training Booth - Paint Spray and Abrasive Blast	5 gal/hr painting 1800 lb/hr blasting	Fabric Filter	CDPNTS-033	PM/PM ₁₀	6/28/10
Liquid Handling Operations							
GSTA-B237-001	-	Commercial Gasoline Service Station for Government Vehicles @ Bldg 237	N/A -	Stage I Vapor Recovery	-	VOC, HAP	-
GSTA-B237-005	-	Commercial Bio fuel Gasoline Service Station for Government Vehicles	N/A -	Stage I Vapor Recovery	-	VOC, HAP	-
Miscellaneous Operations							
MISC-B234-035	STMISC-035	Asbestos Cutting Room Vacuum System - Unknown	N/A	HEPA Filter	CDMISC-035	PM/PM ₁₀	-

B. CNRM Significant Emissions Units:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
ICGF- B558-120	-	Emergency Generator, Olympian D100P1 (pre-2004), Bldg 558, sewer lift station, integral 190 gal belly tank , 40 CFR 63 Subpart ZZZZ	100 KW	-	-	-	-
ICGF-B481-129	-	Emergency Generator Olympian D150P1 (2004), Bldg 481, security, integral 600 gal belly tank, 40 CFR 63 Subpart ZZZZ	201 HP, 150 KW	-	-	-	-

*The Size/Rated capacity is provided for informational purposes only and is not an applicable requirement.

V. EMISSIONS INVENTORY

The 2011 annual emission statement is summarized in the following tables.

A. 2011 Criteria Pollutant Actual Emissions

Emission Units	2011 Criteria Pollutant Emissions in Tons/Year				
	VOC	NO _x	PM ₁₀	CO	SO ₂
Generators < 447 kW	0.2	1.9	0.14	0.4	0.0009
Generators > 447 kW	0.23	4.6	0.30	1.3	0.0027
Outdoor Coating	14.6	-	1.7	-	-
Outdoor Solvents	0.1	-	-	-	-
Chemical Cleaning	3.5	-	-	-	-
Motor Coating	0.7	-	-	-	-
Fire Pump Generators	0.1	1.5	0.11	0.3	0.0007
Booth Spray Coating	5.5	-	0.67	-	-
Outdoor Abrasive Blasting	-	-	0.36	-	-
Booth Blasting	-	-	0.006	-	-
Gas Stations	0.9	-	-	-	-
Powder Coating	-	-	0.0	-	-
Wood Working	-	-	0.0	-	-
Total	25.9	8.1	3.3	2.0	.005

B. 2011 Hazardous Air Pollutant Actual Emissions

Pollutant	2011 Hazardous Air Pollutant Emissions in Tons/Yr
HCl	0.010
Lead	0.0002
Xylenes	0.7

VI. APPLICABLE REQUIREMENTS

A. Internal Combustion Engines (Generators) – Shipyard and CNRMA

1. Limitations

The following federal regulations may be applicable to the internal combustion engines at the shipyard and CNRMA.

40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignitions
Internal Combustion Engines

40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for
Stationary Reciprocating Internal Combustion Engines

Conditions III.A.8 – A.14 and XIII.A.1-A.2 of the Title V permit have been added to address the requirements for specific generators based on size and age for NSPS IIII and MACT ZZZZ. These conditions include references to monitoring and recordkeeping requirements.

The following Virginia Administrative Codes are applicable with specific emission requirements:

9 VAC 5 Chapter 40, Part I	Existing Stationary Sources - Special Provisions
9 VAC 5 Chapter 40, Part II	Article 1: Standard for Visible Emissions – Visible emission limits have been added for the existing generators.
9 VAC 5 Chapter 50	New and Modified Stationary Sources

The following minor NSR conditions from the permit issued June 28, 2010, are applicable requirements for the Title V permit:

NSR Condition 32: Emission Control
NSR Condition 33: Fuel Throughput Limit
NSR Conditions 34 and 35: Fuel Requirements
NSR Condition 36: Fuel Certification
NSR Condition 37: Emission Limits
NSR Condition 38: Visible Emission Limit

Visible emission limits have been added for the existing generators at the shipyard. For CNRMA, the MACT condition referencing the requirements has been included. This condition includes the monitoring and recordkeeping references.

2. Monitoring

Visual emission monitoring has been included to prove compliance with the opacity limit from minor NSR Condition 38 and the visible emission condition for the existing generators (III.A.7).

3. Recordkeeping/Reporting

The recordkeeping and reporting requirements of the August XX, 2012 minor NSR permit condition 40 have been included in the Title V permit. These include fuel throughput records, fuel supplier certifications and all visual emission logs.

B. Abrasive Blasting Operations – Shipyard

1. Limitations

There are no federal regulations applicable to the abrasive blasting operations at the shipyard

The following Virginia Administrative Codes have specific emission requirements applicable:

9 VAC 5 Chapter 40	Part I: Existing Stationary Sources - Special Provisions
9 VAC 5 Chapter 50	New and Modified Stationary Sources
9 VAC 5 Chapter 50	Article 1: Visible Emissions and Fugitive Dust/Emissions

The following minor NSR conditions from the permit issued June 28, 2010, are applicable requirements for the Title V permit:

NSR Conditions 4-9: Emission Controls
NSR Conditions 10-12: Blasting grit throughput limits
NSR Condition 13: Emission Limits

Condition IV.A.13 requires the outdoor blasting operations to minimize PM emissions.

2. Monitoring

The following minor NSR conditions from the permit issued June 28, 2010, are applicable requirements for the Title V permit:

NSR Conditions 14-15: Visible emission monitoring

Condition IV.B.3 requires visible emission monitoring of the outdoor blasting operations.

3. Reporting and Recordkeeping

The recordkeeping and reporting requirements of the August XX, 2012 minor NSR permit condition 40 have been included in the Title V permit. These include grit throughput records, differential pressure gauge observations and all visual emission logs.

C. Wood Working Operations - Shipyard

1. Limitations

There are no federal regulations applicable to the wood working operations at the shipyard. The source does meet the definition of Incidental Wood Furniture Manufacturer under the MACT for Wood Furniture Manufacturing Operations (Subpart JJ) which requires them to keep track of the purchase or usage records to demonstrate that they use no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components and are therefore not applicable to the MACT.

The following Virginia Administrative Codes have specific emission requirements:

9 VAC 5 Chapter 40	Part I: Existing Stationary Sources - Special Provisions
9 VAC 5 Chapter 40	Article 17: Emission Standards For Woodworking Operations
9 VAC 5 Chapter 50	New and Modified Stationary Sources
9 VAC 5 Chapter 50	Article 1: Visible Emissions and Fugitive Dust/Emissions

Conditions V.A.1-6 control the emissions from these units.

2. Monitoring

Visible emission monitoring and cyclone structural integrity checks have been included.

3. Recordkeeping and Reporting

Visible emission logs and documentation of the structural integrity checks have been included as well as documentation of emission factors for the process to show compliance with the emission standard.

D. Degreasing Operations - Non-Halogenated Cold Degreasers – Shipyard

1. Limitations

There are no federal regulations applicable to the degreasing operations at the shipyard.

The following Virginia Administrative Codes have specific emission requirements:

9 VAC 5 Chapter 40	Part I: Existing Stationary Sources - Special Provisions
9 VAC 5 Chapter 40	Article 24: Emission Standards For Solvent Metal Cleaning Operations Using Non-Halogenated Solvents
9 VAC 5 Chapter 50	New and Modified Stationary Sources

Conditions A.1-3 list the operating parameters to be followed to minimize emissions

2. Monitoring

Conditions B.1-2 require monitoring of the labeling and whether the covers are closed on the remote reservoirs along with waste storage practices.

3. Recordkeeping

Conditions C.1-2 list the recordkeeping associated with the monitoring.

E. Electroplating Operations – Shipyard

1. Limitations

The following federal regulation is applicable to the electroplating operations at the shipyard.

40 CFR Part 63, Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing

The following Virginia Administrative Codes are applicable with specific emission requirements:

9 VAC 5 Chapter 50 New and Modified Stationary Sources

The following minor NSR conditions from the permit issued June 28, 2010, are applicable requirements for the Title V permit:

NSR Conditions 18, 24 and 25: Emission Control

NSR Conditions 22 and 23: Emission Limits

2. Monitoring

NSR Conditions 19 – 21 have been pulled into the Title V permit to monitor the emission controls.

3. Recordkeeping/Reporting

The recordkeeping and reporting requirements of the **August XX, 2012** minor NSR permit Condition 28 have been included in the Title V permit. The notifications required in the minor NSR permit have also been pulled into the Title V because the new plant has not been fully installed at this time. Minor NSR reporting Conditions 28-31 have been pulled into the Title V.

4. Testing

Minor NSR Condition 26 requiring initial performance testing of the emission control system has also been pulled into the Title V.

F. Coating Operations – Shipyard

1. Limitations

The following federal regulation is applicable to the electroplating operations at the shipyard.

40 CFR Part 63, Subpart II - National Emission Standards for Shipbuilding and Ship Repair (Surface Coating) (Shipyard MACT)

The following Virginia Administrative Codes are applicable with specific emission requirements:

9 VAC 5 Chapter 40	Part I: Existing Stationary Sources - Special Provisions
9 VAC 5 Chapter 40	Article 1: Visible Emissions and Fugitive Dust/Emissions
9 VAC 5 Chapter 40	Article 33: Metal Furniture Coating Application Systems
9 VAC 5 Chapter 40	Article 34: Miscellaneous Metal Parts /Products Coating Application
9 VAC 5 Chapter 50	New and Modified Stationary Sources
9 VAC 5 Chapter 50	Article 1: Visible Emissions and Fugitive Dust/Emissions

The following minor NSR conditions from the permit issued August XX, 2012, are applicable requirements for the Title V permit:

- NSR Conditions 42-46: Emission Controls
- NSR Conditions 47-49: Throughput Limits
- NSR Conditions 51: Emission Limits

In addition, conditions listing the MACT requirements have been pulled into the Title V: Conditions A.5-9. Other state requirements were also added in Conditions A.1 and 3.

2. Monitoring
Visible emissions monitoring of the paint booths has been pulled from the minor NSR Condition 52. Shipyard MACT monitoring requirements have been added in Condition B.1.
3. Recordkeeping and Reporting
The recordkeeping and reporting requirements of the August XX, 2012 minor NSR permit Conditions 53 and 54 have been included in the Title V permit. Shipyard MACT requirements have been included in the Title V permit (Conditions C.3-5).

G. Liquid Handling Operations – Shipyard

1. Limitations

There are no federal regulations applicable to the liquid handling operations at the shipyard.

The following Virginia Administrative Codes have specific emission requirements:

- | | |
|--------------------|--|
| 9 VAC 5 Chapter 40 | Part I: Existing Stationary Sources - Special Provisions |
| 9 VAC 5 Chapter 40 | Article 37: Petroleum Liquid Storage and Transfer Operations |
| 9 VAC 5 Chapter 50 | New and Modified Stationary Sources |

State requirements from Article 37 have been included in the Title V.

2. Monitoring and Recordkeeping

State requirements from Article 37 have been included in the Title V.

VII. STREAMLINED REQUIREMENTS

There are no streamline requirements in the permit.

VIII. GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

1. Condition B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 2-09”.

2. Condition F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

3. Condition J. Permit Modification

This general condition cites the sections that follow:

- 9 VAC 5-80-50 Applicability, Federal Operating Permit For Stationary Sources
- 9 VAC 5-80-190 Changes to Permits.
- 9 VAC 5-80-260 Enforcement.
- 9 VAC 5-80-1100 Applicability, Permits For New and Modified Stationary Sources
- 9 VAC 5-80-1790 Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
- 9 VAC 5-80-2000 Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

4. Condition U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

5. Condition Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

IX. STATE ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

9 VAC 5-40-140	Existing Source Standard for Odor
9 VAC 5-50-140	New and Modified Source Standard for Odor

X. FUTURE APPLICABLE REQUIREMENTS

There are no known future applicable requirements at this time.

XI. INAPPLICABLE REQUIREMENTS

The permit includes a table of regulations that have been identified as being inapplicable to this facility.

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 4 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

XII. COMPLIANCE PLAN

There is no compliance plan for this facility.

XIII. INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

A. Shipyard Insignificant Emission Units:

Emission Unit No.	Emission Unit Description	Citation	Pollutant Emitted	Rated Capacity
ABRA-GRP	Abrasive Blasting gloveboxes	2	PM, PM ₁₀ , Sb, Cd, Cr, Co, CN, Pb, Mn, Ni, P	N/A
BOIL-005, 006, 007, 123, 125, 127	External Combustion Boilers, Commercial/Institutional(0.3-10 MMBtu/hr)	2,3	CO, NO _x , PM, PM ₁₀ , SO _x , VOC	9.0, 9.0, 4.0, 5.0, 9.9, and 9.9 MM Btu/hr, respectively
BOIL-009, 011, 105, 107	External Combustion Boilers, Commercial/Institutional (0.3-10 MMBtu/hr)	2	PM, PM ₁₀ , CO, NO _x , SO _x , VOC, As, Be, Cd, Cr, Pb, Mn, Hg, Ni, Formaldehyde, Total POM (Polycyclic organic matter)	N/A
BOIL-GP5	External Combustion Boilers, Space Heaters (< 0.3 MMBtu/hr)	2,3	CO, NO _x , PM, PM ₁₀ , SO _x , VOC	11 @ 0.19 MM Btu/hr
CAST-004	Casting Pot Cleaning Tank	2	No Regulated Pollutants	N/A
CHMC-001	Alkaline Cleaning Tank	2	No Regulated Pollutants	N/A
CHMC-002	Acid Cleaning Tank	2	No Regulated Pollutants	N/A
CHMC-004	Acid Cleaning Tank	2	No Regulated Pollutants	N/A
CHMC-B1329-005A	Solvent Cleaning Tank (Pro Strip-B)	2	VOC	N/A
CHMC-006	Acid Cleaning Tank	2	Hydrogen chloride	N/A
CHMC-007	Acid Cleaning Tank	2	Hydrogen fluoride	N/A
CHMC-008	Acid Cleaning Tank	2	Dichromic acid, disodium salt, PM, PM ₁₀	N/A
CHMC-009	Acid Cleaning Tank	2	Dichromic acid, disodium salt, PM, PM ₁₀	N/A
CHMC-010	Acid Cleaning Tank	2	Dichromic acid, disodium salt, PM, PM ₁₀ , Sodium chromate	N/A
CHMC-012	Neutralization Tank Emissions	2	Sodium Carbonate, PM, PM ₁₀	N/A
CHMC-013	Rinse Tank Emissions	2	PM, PM ₁₀	N/A
CHMC-019	Nitric Acid Cleaning Line	2	NO _x (Nitrogen oxides)	N/A
CHMC-020	Cleaning Tank	2	No Regulated Pollutants	N/A
CHMC-022	Cleaning Tank	2	Chlorine	N/A
CHRG-GRP	Battery Charging Operations	2	No Regulated Pollutants	N/A
CLNO-001	Cleaning Machine	2	PM, PM ₁₀ , VOC	N/A
CLNO-009	Silk Screening Cleaning Operation	2	PM, PM ₁₀ , VOC	N/A

Emission Unit No.	Emission Unit Description	Citation	Pollutant Emitted	Rated Capacity
CLNO-B235-016	Better Engineering Natural Orange Parts Washer	2	VOC	N/A
DEGA-GRP	Aqueous Degreasing Operations	1	N/A	N/A
DEGS-B238-052	Dry Cleaning Solvent Parts Washer	2	VOC	N/A
DEGS-B278-059		2	VOC	N/A
DEGS-B163-066		2	VOC	N/A
ENGT-002 & 003	Small Engine Testing	2	1,3-Butadiene, Acenaphthene, Acenaphthylene, Acetaldehyde, Acrolein, Anthracene, Benz(a)anthracene, Benzene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(g,h,i)perylene, Benzo(k)fluoranthene, CO, Chrysene, Dibenz(a,h)anthracene, Fluoranthene, Fluorene, Formaldehyde, Indeno(1,2,3-cd)pyrene, Naphthalene, NO _x , PAH, PM, PM ₁₀ , Phenanthrene, Pyrene, SO _x , Toluene, VOC, Xylenes (mixed isomers)	N/A
EPLT-001 –EPLT-008, EPLT-010-EPLT-039, & EPLT-041-EPLT-048	Miscellaneous Plating Tanks	1	PM, PM ₁₀	N/A
FREN-027	Freon Cleaning Hood	2	Ozone Depleting Substances	N/A
FREN-GRP	Portable Refrigerant Recovery Units	2	Ozone Depleting Substances	N/A
FURN-002, 003, 006, 007, 046, 057, 060, 061, 065, 071, 072, 075, 077, 089-095, 100,	External Combustion Boilers, Commercial/Institutional (0.3-10 MMBtu/hr)	2,3	CO, NO _x , PM, PM ₁₀ , SO _x , VOC	1.5, 1.5, 1.5, 0.3, 0.8, 0.8, 0.8, 0.8, 1.5, 1.5, 1.5, 1.8, 0.194, 1.5, 1.5, 1.5, 1.5, 0.29, 1.5, 1.5, 1.5, 0.25, 0.25, 0.25, 0.0006, 4.34, 0.25 & 2.0 MMBtu/hr, respectively
GSTA-003	Commercial Diesel Service Station for Government Vehicles @ Bldg 237	2	VOC	N/A
IWTP-011	DAF Wastewater Treatment System	2	Phenol, Naphthalene, Benzene, Toluene, Ethylbenzene, Xylene, Arsenic, Cadmium, Chromium, Lead, Nickel, Mercury	N/A
IWTP-012-016 (See IWTP-GRP)	DAF Wastewater Treatment System	2	Phenol, Naphthalene, Benzene, Toluene, Ethylbenzene, Xylene, Arsenic, Cadmium, Chromium, Lead, Nickel, Mercury	N/A

Emission Unit No.	Emission Unit Description	Citation	Pollutant Emitted	Rated Capacity
LAB-GRP	Laboratory Hoods	2	No regulated pollutants	N/A.
MISC-004	Polyurethane Molding Hoods	2	VOC (Volatile organic compounds)	N/A
MISC-007	Paper Shredder Operation	2	PM, PM ₁₀	N/A
MISC-019	Fiberglass Lagging Area	2	PM, PM ₁₀	N/A.
MISC-034	Fiberglass Lagging Area	2	PM, PM ₁₀	N/A.
MISC-040	Rubber Cutting Area	2	PM, PM ₁₀	N/A
MISC-052	Plexiglass cutting machine	2	PM, PM ₁₀	N/A.
MISC-1499-053	Two(2) Large Abrasive Blast Booths	2	PM, PM ₁₀	N/A
MISC-056	Three (3) LaserEngravers	2	PM, PM ₁₀	N/A.
MISC-059	Laser Pattern Cutter	2	PM, PM ₁₀	N/A.
MISC-060	Laser Engraver (B510)	2	PM, PM ₁₀	N/A.
MTWK-GRP	Metal Working Operations	2	No regulated pollutants	N/A.
MTWK-005	Hot Parts Quench Tank	2	No regulated pollutants	N/A
OCOT-005	Gluing/Sealing Operation	2	PM, PM ₁₀ , VOC, Xylenes (mixed isomers)	N/A
OCOT-006	Wood Staining	2	2-Butoxy ethanol, 2-Butoxyethyl acetate, 2-Ethoxyethanol acetate, Chromate, Dioctyl phthalate, Ethylbenzene, Ethylene glycol, Hexane, Lead & Lead compounds, Manganese, Methanol, MIBK, PM, PM ₁₀ , Toluene, Vinyl acetate, VOC, Xylenes (mixed isomers)	N/A
OVNC-004	External Combustion Boilers, Commercial/Institutional	2,3	CO, NO _x , PM, PM ₁₀ , SO _x , VOC	1.5 MM Btu/hr
OVNC-010	External Combustion Boilers, Commercial/Institutional (0.3-10MMBtu/hr)	2	CO, NO _x , PM, PM ₁₀ , SO _x , VOC	N/A
OVNE-002	Drying Oven #2	2	VOC	N/A
OVNE-003	Teflon Drying Oven	2	Toluene, VOC, Xylenes (mixed isomers)	N/A
OVNE-005	Electric Paint Drying Oven #2	2	Toluene, VOC	N/A
OVNE-006	Electric Paint Drying Oven #3	2	Toluene, VOC	N/A
OVNE-008	Motor Dip Tank Drying Oven	2	VOC, Xylenes (mixed isomers)	N/A
OVNE-009	Motor Dip Tank Drying Oven	2	VOC, Xylenes (mixed isomers)	N/A
OVNE-010	Motor Dip Tank Drying Oven	2	VOC, Xylenes (mixed isomers)	N/A
OVNE-011	Motor Dip Tank Drying Oven	2	VOC, Xylenes (mixed isomers)	N/A
OVNE-014	Plasticol Bake-Off Oven	2	VOC	N/A
OVNE-015	Electric Drying Oven	2	Ethylene glycol, Toluene, VOC, Xylenes (mixed isomers)	N/A

Emission Unit No.	Emission Unit Description	Citation	Pollutant Emitted	Rated Capacity
OVNE-016	Powder Coat Curing Oven	2	VOC	N/A
OVNE-018	Powder Coat Curing Oven	2	VOC	N/A
PNT0-005	Crane Painting – Spray cans	2	VOC	N/A
PNT0-006	Silk Screening/Handpainting	2	VOC	N/A
PNTS-010	Spray Painting	2	PM, PM ₁₀ , Toluene, VOC	N/A
PNTS-022	Spray Painting	2	PM, PM ₁₀ , Toluene, VOC	N/A
PNTS-025	Paint Booth	2	PM, PM ₁₀ , VOC	N/A
PNTS-026	Paint Booth	2	2-Butoxyethyl acetate, Lead, MIBK, PM, PM ₁₀ , Toluene, Triethylamine, VOC, Xylenes (mixed isomers)	N/A
PNTS-027	Paint Booth	2	1,6-Diisocyanatohexane, Ethylbenzene, Glycol ethers, MIBK, PM, PM ₁₀ , Toluene, VOC Xylenes (mixed isomers)	N/A
STMC-GRP	Steam Cleaning Operations	2	No regulated pollutants	N/A
TNKA-002, 003, 004, 005, 173,	Vertical Fixed Roof Storage Tank, Crude Oil (RVP 2)	2	Naphthalene, Toluene, VOC	N/A
TNKA-006	Vertical Fixed Roof Storage Tank, H ₂ O	2	Naphthalene, Toluene, VOC	N/A
TNKA-009, 010, 022, 027, 028, 029, 030, 101, 227, 228, 229, 230	Horizontal Fixed Roof Storage Tank, Distillate Fuel Oil No. 2	2	Naphthalene, Toluene, VOC	N/A
TNKA-172, 181, 182, 183, 189, 191, 193, 197, 209, 211,	Horizontal Fixed Roof Storage Tank	2	Naphthalene, Toluene, VOC	N/A
TNKU-002, 003	Horizontal Fixed Roof Storage Tank, Gasoline (RVP 13)	2	2,2,4-trimethylpentane, Benzene, Ethylbenzene, Hexane, Toluene, VOC, Xylenes (mixed isomers)	N/A
TNKU-021, 022	Horizontal Fixed Roof Storage Tank, Distillate Fuel Oil No. 2	2	Naphthalene, Toluene, VOC	N/A
WELD-GRP	Maintainence Welding Operations	2	No regulated pollutants.	N/A
WSTL-GRP	Oil/Water Separators	2	Benzene, Hexane, Naphthalene, VOC	N/A

¹The citation criteria for insignificant activities are as follows:

- 1: 9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
- 2: 9 VAC 5-80-720 B - Insignificant due to emission levels
- 3: 9 VAC 5-80-720 C - Insignificant due to size or production rate

B. CNRMA Insignificant Emission Units:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
<i>FURN-079, 081, 087, 101</i>	<i>External Combustion Boilers, Space Heaters (< 0.3 MMBtu/hr)</i>	<i>9 VAC 5-80-720 B, 9 VAC 5-80-720 C</i>	<i>CO, NO_x, PM, PM₁₀, SO_x, VOC</i>	<i>0.28, 0.28, 0.28, 0.097 MMBtu/hr, respectively</i>
<i>FIRI-001, 002</i>	<i>Firing Range</i>	<i>9 VAC 5-80-720 B</i>	<i>PM, PM₁₀, Lead</i>	<i>Not Applicable</i>
<i>TNKA-023, 024, 199, 231</i>	<i>Horizontal Fixed Roof Storage Tank, Distillate Fuel Oil No. 2</i>	<i>9 VAC 5-80-720 B</i>	<i>Naphthalene, Toluene, VOC</i>	<i>Not Applicable</i>

XIV. CONFIDENTIAL INFORMATION

The source has not identified any information as confidential. All portions of the application and permit are suitable for public review.

XV. PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in the Virginian Pilot from August XX, 2012 to September XX, 2012.